

**REMARKS**

Applicants wish to thank the examiner for the responsive and courteous telephone interview conducted on May 9, 2005 for the purposes of furthering the prosecution of this application. The examiner was able to immediately retrieve the file and discuss the subject matter contained therein upon an initial telephone contact, and his ability to immediately discuss the subject matter encompassed by the claims without delay is most appreciated.

***In the Specification***

Responsive to the examiner's comments, the title of the invention has been amended. It is believed that the amended title is clearly indicative of the invention to which the claims are directed.

The abstract of the disclosure has been amended to remove "means" phraseology response to the examiner's comments, and it is believed the abstract of the disclosure is allowable as amended under MPEP Sec. 608.

***Claim Rejections - 35 USC § 102***

Claims 1-2 and 10-11. Claims 1-2 and 10-11 stand rejected under 35 USC § 102(b) as being anticipated by Matrone (US Pat. No. 4,352,061).

As discussed with the examiner in a telephone interview conducted May 9, 2005, article claims 1-2 and corresponding method claims 10-11 have been canceled. New article claim 21 is presently submitted incorporating limitations from canceled claims 1 and 2 and further incorporating additional limitations supported by the specification as originally filed, the invention defined thereby not anticipated by Matrone. New article claims 22-27 depend upon new article claim 21 and claim additional limitations supported by the specification and claims as originally filed. As they incorporate all of the limitations of claim 21, they are also believed to be allowable over Matrone.

New method claim 28 is presently submitted incorporating limitations from canceled claims 10 and 11 and corresponding to new article claim 21; new method claim 28 also further incorporating additional limitations supported by the specification as originally filed, the invention defined thereby not anticipated by Matrone. New method claims 29-34 depend upon

new method claim 28 and contain additional limitations supported by the specification and claims as originally filed; as they incorporate all of the limitations of claim 28, they are also believed to be allowable over Matrone.

Specifically, Matrone teaches a top plate 16 that allows his test probe tips 44 to pass through the apertures for all test probes 24:

Top plate 16 is also provided with a number of top plate apertures 52 which permit the tips of probes 47 to pass therethrough as illustrated in FIG. 4. *Apertures 52 are necessarily above the selected probe assemblies (i.e., those probe assemblies contacting probe selector posts 24)...*

It will be appreciated that boards having different patterns of test points can be tested with this invention by changing certain parts of it. Personalizer 12 and top plate 16 would be changed while universal matrix platen 14 would not. Even top plate 16 may be retained if each new board is the same size as original board 18 *and apertures 52 exist at least above all the probe assemblies encompassed within the area of board 18.*

Matrone at column 4, lines 52-57, and at column 6, lines 17-24.

Thus, Matrone does not teach probe selector posts 24 located outside of the apertures 52 and brought into contact with the top plate 16, the top plate 16 preventing engagement of the probe selector posts 24 with the electrical device and return of a test result from the first probe to the testing apparatus. Instead, though he shows and contemplates that some of the receptacle 30/collar 42 assemblies may be occluded by the top plate 16, none of the receptacle 30/collar 42 assemblies so occluded are associated with test probes. His top plate does not mask or otherwise prevent the return of a test result from any test probe in circuit communication with the test circuit.

In contrast, new independent article claim 21 and new independent method claim 28 claim a first cluster probe in circuit communication with a test circuit and located outside of the first contact pad footprint brought into contact with a mask membrane, the membrane thereby preventing engagement of the first probe with the electrical device and return of a test result from the first probe to the testing apparatus. Thus new claims 21 and 28 are believed allowable over Matrone.

Moreover, new article claim 22 and new method claim 29 further provide additional limitations supported by the specification as originally filed. Specifically, they claim a mask membrane defining a second aperture aligned with a second electrical device having a second plurality of contact pads defining a composite two-dimensional second contact pad footprint

divergent from the probe footprint and the first contact pad footprint, wherein in a test routine second test step a second probe located inside the first pad footprint and outside of the second contact pad footprint is brought into contact with the mask membrane, the membrane thereby preventing engagement of the second probe with the electrical device and return of a test result from the second probe to the testing apparatus. Matrone does not teach multiple apertures accommodating divergent electrical device testing on the same electrical module as presently claimed, and new claims 22 and 29 are further believed allowable over Matrone for these additional reasons.

Claims 19-20. Claims 19-20 stand rejected under 35 USC § 102(b) as being anticipated by Burr et al (US Pat. No. 4,565,966).

Claim 19 has been amended to incorporate all of the limitations present in claim 3 as originally submitted (and, therefore, all of the limitations of the parent independent claim 1). As claim 3 has been "objected to as being dependent upon a rejected base claim, but allowable if rewritten in independent form including all implementations of the base claim in any intervening claims" in the examiner's letter of March 10, 2005, it is believed that claim 19 as presently amended is allowable over Burr et al. As claim 20 is dependent upon claim 19 and, therefore, incorporates all of its limitations, claim 20 is also believed to be allowable as presently amended.

#### *Claim Objections*

Claims 3-9 and 12-18 have been objected to by the examiner in his letter of March 10, 2005, as "being dependent upon a rejected base claim, but allowable if rewritten in independent form including all implementations of the base claim in any intervening claims." Claim 3 is dependent upon claim 1, without an intervening claim. Claim 1 has been cancelled and claim 3 rewritten in independent form to incorporate all of the limitations of the rejected base claim 1 and is believed to be allowable as presently amended. Claims 4-9 are dependent upon and include all the limitations of amended independent claim 3, and are, therefore, also believed to be in condition for allowance.

Similarly, claim 12 is dependent upon claim 10, without an intervening claim. Claim 10 has been cancelled and claim 12 rewritten in independent form to incorporate all of the limitations of rejected base claim 10 and is believed to be allowable as presently amended. Claims 3-18 are

dependent upon and include all the limitations of amended independent claim 12, and are, therefore, also believed to be in condition for allowance.

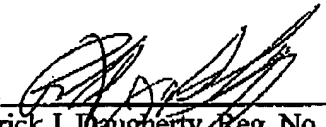
***Other prior art made of record.***

It is believed that the claims presently before the examiner are allowable over the teachings of the other prior art made of record in the examiner's letter of March 10, 2005, namely Vaucher (US Pat. No. 5,216,358); Fjelstad (US Pat. No. 6,211,690); Fohlich (US Pat. No. 4,471,298); and Look et al (US Pat. No. 5,150,042).

**In conclusion**, claims 3-9 and 12-34 as presently amended or submitted or previously filed, now before the examiner responsive to this filing, are believed to be in condition for allowance, and early notification thereof is respectfully requested.

Respectfully submitted,

Date: May 24, 2005

By:   
Patrick J. Daugherty, Reg. No. 41,697  
Driggs, Lucas, Brubaker & Hogg Co., L.P.A.  
Customer No. 26681

PJD:cg